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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RONNIE L. BROWN,
Plaintiff,

vs.
LIBERTY COUNTY MUTUAL
INSURANCE
COMPANY,
Defendant.

} CASE NO.: 2:20-cv-00163-GMN-DJA

} **STIPULATION TO EXTEND
DEADLINE TO RESPOND TO
MOTION FOR SUMMARY
JUDGMENT**

} **[First Stipulation to Extend]**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff RONNIE L. BROWN, by and through his attorney of record, MITCHELL POSIN, ESQ., of the law offices of Mitchell Posin, Chtd., and ANDREW GREEN, ESQ., of Koeller Nebeker Carlson Haluck, LLP, to an enlargement of the time to respond to Defendant's Motion for Summary Judgment, to and including January 8, 2021.

The stipulation is based on conflicting scheduling demands.

Pursuant to Local Rule IA 6-1(a), the parties affirm that, although this is the first filing of a stipulation with the Court, the parties had orally agreed to extend the time to

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1 respond prior to the expiration of the time to respond.

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3 Dated this 23 day of December, 2020.

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5 /s/ Mitchell Posin

6 Mitchell L. Posin, Esq.
Law Offices of Mitchell Posin, Chtd.
410 South Rampart Boulevard, Suite 390
7 Las Vegas, Nevada 89145
Attorney for Plaintiff

/s/ Andrew Green

Andrew Green, Esq.
Koeller Nebeker Carlson Haluck, LLP
400 S Fourth St
Las Vegas, NV 89101
Attorney for Defendant

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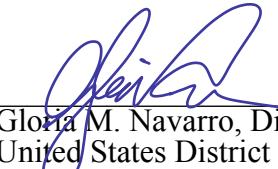
10 IT IS SO ORDERED.

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12 Dated this 29 day of December, 2020.

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Gloria M. Navarro, District Judge
United States District Court

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Declaration of Mitchell Posin

Plaintiff requires additional time to respond to Defendant's Motion for Summary Judgment due to additional scheduling demands, and deadlines in other cases.

Plaintiff has discussed the matter with Defense Counsel, who has no objection to the extension, and has authorized the undersigned to affix his electronic signature hereto.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 15 day of October, 2020.

Respectfully submitted,

by: _____/s/ Mitchell Posin _____